



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

MAY 21 1998

Ms. Virginia Slowik  
Gallard-Schlesinger Industries, Inc.  
584 Mineola Ave.  
Carle Place, NY 11514

Dear Ms. Slowik:

This is in response to your letter dated March 30, 1998, requesting clarification on labeling and placarding for "Toxic Liquids, Organic, n.o.s., 6.1, UN 2810, III" under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether the KEEP AWAY FROM FOOD or the POISON labels and placards should be used for shipping your product.

Section 172.400a(d) allows the use of the POISON label in place of the KEEP AWAY FROM FOOD label for Division 6.1 Packing Group III materials. In addition, § 172.504(f)(10) allows the use of the POISON placard in place of the KEEP AWAY FROM FOOD placard for Division 6.1 Packing Group III materials domestically. The KEEP AWAY FROM FOOD label and placard are no longer used in international transportation. The North American Emergency Response Guidebook (ERG) is not a regulatory document and does not require the use of a specific label or placard. Therefore, when shipping your product domestically under the HMR, you may use either the KEEP AWAY FROM FOOD or POISON labels and placards as specified in the HMR.

I hope this answers your inquiry. If you need additional assistance, do not hesitate to contact us.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



# TELEFAX MESSAGE

**Gallard-Schlesinger Industries, Inc.** • 584 Mineola Ave., Carle Place, NY 11514, USA  
Telefax 516-333-5628 (In case of difficulty telephone 516-333-5600)

DATE: March 30, 1998

TIME: \_\_\_\_\_

PAGES: 1 of \_\_\_\_\_

FROM: Virginia Slowik

TO: DEPARTMENT OF TRANSPORTATION 202 366 8700

ATT: Mr. Edward Mazzullo, Director of Office of Hazardous Material Standards

RE: Proper labelling/placarding for shipment

*Boyle*  
*File: 172.409*  
*172.500*  
*SC'259,27*

Dear Mr. Mazzullo,

we would like a written interpretation regarding a material for shipment.  
The material falls under the Toxic, Liquids, Organic, N.O.S.  
The UN number is 2810  
Class 6.1  
PG III

As we understand it, the St. Andrews cross may be used (Harmful, Stow Away from Foodstuffs,) but there is some confusion as the Emergency Response Guidebook reflects the Skull and cross bones label and placard.

Please advise what is the correct shipping labelling/placard procedure should be so we ensure proper shipping procedure.  
Please advise if we need to send a formal letter to you and if you have any question, please call me at (516) 333-5600.

Thank you.

Best regards,

Virginia Slowik

/vs